

DAVID L. ANDERSON (CABN 149604)  
United States Attorney  
SARA WINSLOW (DCBN 457643)  
Chief, Civil Division  
PAMELA T. JOHANN (CABN 145558)  
Assistant United States Attorney

450 Golden Gate Avenue, Box 36045  
San Francisco, California 94102  
Telephone: (415) 436-7025  
Facsimile: (415) 436-7234  
[pamela.Johann@usdoj.gov](mailto:pamela.Johann@usdoj.gov)

Attorneys for Defendant

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

## THE CENTER FOR INVESTIGATIVE REPORTING and JENNIFER GOLLAN,

## Plaintiffs,

V.

UNITED STATES DEPARTMENT OF  
LABOR

**Defendant**

) Case No. 18-cv-02414-DMR

3)

) **SECOND STIPULATED JOINT REQUEST TO  
EXTEND BRIEFING SCHEDULE REGARDING  
MOTION FOR SUMMARY JUDGMENT;  
ORDER**

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The parties, by and through their undersigned attorneys, hereby stipulate pursuant to Civil Local Rule 6-1(b) and 7-12, subject to the approval of the Court, to extend the schedule regarding the parties' Motions for Summary Judgment. This stipulation is based on the accompanying Declaration of Pamela T. Johann and the following facts:

1. On July 2, 2019, this Court entered an order granting the parties' stipulated request to establish a briefing schedule for cross-motions for summary judgment. Dkt. No. 21. On August 20, 2019, the Court entered an order granting the parties' stipulation extending the briefing schedule on the motions. Dkt. No. 23. Under this schedule, the last day for Defendant to file its Motion for Summary Judgment is September 3, 2019.

2. Defendant is in the process of preparing its moving papers but has encountered some

1 delays due in part to the illness of one of the anticipated declarants. Due to these circumstances and the  
2 intervening holiday weekend, Defendant has requested, and Plaintiff has agreed, to extend by one week  
3 the time for Defendant to file its Motion for Summary Judgment. The hearing date shall remain  
4 December 12, 2019. The parties do not currently anticipate needing to modify the other filing dates, but  
5 if any further adjustment is needed, they will submit another stipulated request.

6       3. Accordingly, the parties have stipulated to extend the last day for Defendant to file a  
7 motion for summary judgment until September 10, 2019. The parties jointly request that the Court enter  
8 an order revising the schedule accordingly.

9 DATED: August 30, 2019

Respectfully submitted,

10 DAVID L. ANDERSON  
United States Attorney

11 */s/ Pamela T. Johann*  
12 PAMELA T. JOHANN  
13 Assistant United States Attorney

14 Attorneys for Defendant

15 DATED: August 30, 2019

16 THE CENTER FOR INVESTIGATIVE  
17 REPORTING

18 */s/ D. Victoria Baranetsky*  
19 D. VICTORIA BARANETSKY

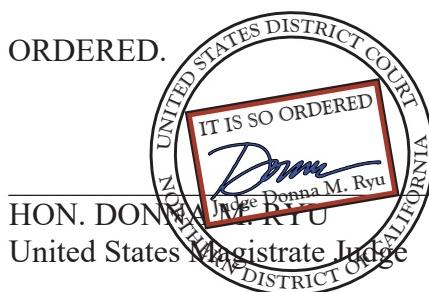
20 Attorneys for Plaintiffs

21 ATTESTATION

22 I, Pamela T. Johann, hereby attest that I have obtained the concurrence in the filing of this  
23 document from D. Victoria Baranetsky.

24 */s/ Pamela T. Johann*  
25 PAMELA T. JOHANN

1 ORDER  
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3 PURSUANT TO STIPULATION, IT IS SO ORDERED.  
4 Dated: September 3, 2019  
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HON. DONNA M. RYU  
United States Magistrate Judge